



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**  
1200 Sixth Avenue  
Seattle, WA 98101

**JUN 09 2006**

Reply To  
Attn Of: ECL-116

Mike Knight, Operations Manager  
Valley Fruit III, LLC  
12 Hoffer Road  
Wapato, Washington 98951-9519

Re: Inspection of Risk Management Program (RMP)  
EPA RMP Facility ID# 1000 0017 1075

Dear Mr. Knight,

The US Environmental Protection Agency will be inspecting the Valley Fruit III, LLC facility located at 12 Hoffer Road, Wapato, Washington on Wednesday, June 21, 2006. This inspection will look specifically at compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection is conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act.

The inspection team (consisting of myself, Catherine Fontana and Bob Hales) plans to arrive at the facility around 1:00 PM and complete our work around 5:00 PM. We will need assistance from those responsible or familiar with the Risk Management Program during this time. The schedule we generally follow is as follows:

- 1) Introduction and brief review of purpose of visit (EPA)
- 2) Brief explanation of facility operations (Facility)
- 3) Safety briefing for EPA personnel and tour of facility, concentrating on RMP-covered process (led by Facility)
- 4) Review of Risk Management Program documents and latest Tier II report (EPA)
- 5) Close-out discussion (EPA & Facility)

Please be advised that we take photos during our tour of the covered process, in addition to inspecting equipment and processes of concern. The following documents should be made available during the time of our inspection:



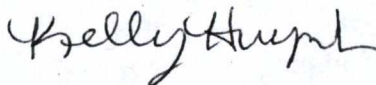
- 1) A copy of the most recent RMP and Tier II report
- 2) Hazard Assessment (Worst Case and Alternative Release scenarios)
- 3) RMP Prevention Program documentation including:

RMP PROGRAM 3 PREVENTION PROGRAM		OSHA PSM REFERENCE
§ 68.65	Process Safety Information	PSM standard § 1910.119(d)
§ 68.67	Process Hazard Analysis (PHA)	PSM standard § 1910.119(e)
§ 68.69	Operating Procedures	PSM standard § 1910.119(f)
§ 68.71	Training	PSM standard § 1910.119(g)
§ 68.73	Mechanical Integrity	PSM standard § 1910.119(j)
§ 68.75	Management of Change	PSM standard § 1910.119(l)
§ 68.77	Pre-Startup Review	PSM standard § 1910.119(i)
§ 68.79	Compliance Audits	PSM standard § 1910.119(o)
§ 68.81	Incident Investigation	PSM standard § 1910.119(m)
§ 68.83	Employee Participation	PSM standard § 1910.119(c)
§ 68.85	Hot Work Permit	PSM standard § 1910.119(k)
§ 68.87	Contractors	PSM standard § 1910.119(h)

- 4) Emergency Response Plan or Emergency Action Plan

We appreciate your cooperation, and particularly your efforts to gather the required documents beforehand. Having the materials readily available will greatly speed-up our inspection. If you have any questions, please feel free to contact me at (206) 553-1679.

Sincerely,



Kelly Huynh  
CAA 112(r) Coordinator  
EPA Region 10